

BOSTON
REDEVELOPMENT
AUTHORITY

Raymond L. Flynn
Mayor

Stephen Coyle
Director

One City Hall Square
Boston, MA 02201
(617) 722-4300

DOC # 5069
ADOPTED HAS AMENDED
6/30/88
DRAFT
For
Discussion Purposes Only

July 10, 1988

Mr. Sumner Edelstein, Vice President
Charles River Properties, Ltd.
1 Longfellow Plaza Suite
Boston, MA 02114

Mr. James Van Sickle, Senior Associate
Benjamin Thompson Associates
One Story Street
Cambridge, MA 02138

RE: Charles River Plaza

Dear Messrs. Edelstein and Van Sickle:

On May 10, 1988, the Boston Redevelopment Authority received a Project Notification Form for the above-named project. Due to the complexity of the proposed project, the Authority extended the date of issuance of this Scoping Determination to July 10, 1988.

At the outset, it should be specified that Charles River Plaza is located within an urban renewal area and is therefore subject to the conditions of the West End Land Assembly and Redevelopment Urban Renewal Plan. The proposed project as submitted by your group requires a modification to the Urban Renewal Plan. The review and consideration of all Urban Renewal Plan modifications are subject to approval by the Board of the Boston Redevelopment Authority.

You may wish to
~~It is recommended that you seek approval for a modification of the West End Land Assembly and Redevelopment Urban Renewal Plan before proceeding any further with the review process. However, if you elect to proceed with the preparation of a Draft Project Impact Report (DPIR) without first seeking a modification to the West End Land Assembly and Redevelopment Plan, the Authority will process your proposal in compliance with Article 31. If you proceed in this manner, you do so at the risk of expending considerable time and money without any indication from the Authority that it will effect a plan change.~~

The attached Scoping Determination sets forth those aspects of the project which must be studied, analyzed and, where necessary, mitigated. The proposed project is located within the Downtown



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Discussion Purposes Only

Mr. Sumner Edelstein

-2-

Mr. James Van Sickle

July 10, 1988

Interim Planning Overlay District (IPOD) on a site located within both Priority Preservation Subdistrict "F" and Medium Growth Subdistrict "M". Under the Downtown IPOD, the as-of-right zoning for development in these districts provides for a Floor Area Ratio (FAR) of 2 and a maximum height of 65 feet within the "F" subdistrict, and an FAR of 8 and height of 125 feet within the "M" subdistrict. An enhancement in Subdistrict "M" would allow an FAR of 10 and height of 155 feet, if such a height and massing would be consistent with the surrounding area and be architecturally compatible with the surrounding subdistrict.

Your Draft Project Impact Report submission materials should include the following alternatives:

1. All components requested in the Scoping Determination should be provided for a project conforming with the height and density controls for subdistricts "F" and "M", i.e., FAR 2, 65 foot height and FAR 8, 125 foot height, respectively.
2. Should you choose, you may also submit information for a project based on the enhanced height and massing controls outlined in the Downtown IPOD, i.e., height of 155 feet and FAR 10 for that portion of the project within subdistrict "M".
3. All components requested in the Scoping Determination should be provided for a project conforming with the controls of the West End Urban Renewal Plan for Parcel 1-G.

Additional information may be required during the course of our review of the project. Should you or your counsel have any questions concerning these matters, please contact me or Muhammad Abdus-Sabur of my staff.

Sincerely,

William D. Whitney
Acting Assistant Director for
Urban Design and Development

Attachments

CHARLES RIVER PLAZA SCOPING DETERMINATION

Submission Requirements
For Draft Project Impact Report (DPIR)

In addition to full-size scale drawings, 20 copies of a bound booklet containing all submission materials reduced to size 8½ x 11, except where otherwise specified, are required.

I. GENERAL INFORMATION

1. Applicant Information

A. Development Team

1. Names

- a. Developer (including description of development entity)
- b. Attorney
- c. Project consultants

2. Business address and telephone number for each

3. Designated contact for each

4. Description of current or formerly-owned developments in Boston

B. Legal Information

1. Legal judgments or actions pending concerning the proposed project

2. Status of any pending litigation with regard to the acquisition, disposition, ownership, or development of real estate to which any of the principals involved (holders of an equity interest) in this project are a party which have been filed in any court in the Commonwealth of Massachusetts and the disposition of any litigation initiated in the Commonwealth which has been settled or tried to judgement in the last five years.

3. History of tax arrears on property owned in Boston by development team

4. Property Title Report including current ownership and purchase options of all parcels in the development site
2. Financial Information
(See Appendix 1 for required financial information.)
 - A. Full disclosure of names and addresses of all financially involved participants and bank references
 - B. Nature of agreements for securing parcels not owned by prospective developer
 - C. Development Pro Forma
 - D. Ten Year Operating Pro Forma
3. Project Area
 - A. Description of metes and bounds of project area
4. Employment Plan

Boston Jobs Policy requires that publicly-assisted and large-scale private commercial projects hire Boston residents, minorities, and women for construction jobs for 50, 25, and 10 percent, respectively, of the person-hours worked. In addition, developers may be requested to submit permanent employment plans intended to meet a goal that the profile of permanent employees in the building include Boston residents (50 percent), minorities (30 percent), and women (50 percent). Submission materials should include the following:

 - A. Estimated number of construction jobs
 - B. Estimated number of permanent jobs
 - C. Agreement to enter into Boston Resident Construction Jobs Plans
 - D. Plan for meeting Boston Resident Permanent Jobs Standards
5. Public Benefits
 - A. Development Impact Project exaction, specifying amount of housing linkage and jobs linkage contributions and method of housing linkage contribution (housing payment or housing creation)
 - B. Increase in tax revenues, specifying existing and estimated future annual property taxes

6. Regulatory Controls and Permits

- A. Existing zoning requirements, calculations, and any anticipated requests for zoning relief.
- B. Anticipated permits required from other local, state, and federal entities with a proposed application schedule
- C. For projects requiring compliance with the Massachusetts Environmental Policy Act (MEPA), copies of the Environmental Notification Form, Certificate of the Secretary of Environmental Affairs, and Environmental Impact Report, if required
- D. Other applicable environmental documentation

7. Community Groups

- A. Names and addresses of project area owners, displaces, abutters, and also any community groups which, in the opinion of the applicant, may be substantially interested in or affected by the proposed project
- B. A list of meetings proposed and held with interested parties

II. TRANSPORTATION COMPONENT

The transportation component should contain a description of transportation issues and objectives and, where appropriate, an identification of the circulation alternatives which need to be considered in an analysis of these transportation impacts of development.

The following must be submitted for all development options:

1. Parking
 - a. Number of spaces provided indicating public and private allocation
 - b. Reduction in parking from previous use of site
 - c. Proposal's impact on demand for parking
 - d. Parking plan, including layout, access, and size of spaces
 - e. Evidence of compliance with City of Boston parking freeze requirements
 - f. Description of measures to reduce parking demand
2. Loading
 - a. Number of docks
 - b. Location and dimension of docks
3. Access
 - a. Size and maneuvering space on-site or in public right-of-way
 - b. Access, curb cuts, and/or sidewalk changes required
4. Vehicular Traffic
 - a. Project vehicular traffic demand and generation (daily and peak-hours) and distribution
 - b. Circulation and access impacts on the local and regional street system and local intersections (traffic impact area), including capacity and level-of-service analyses

- c. Modal split and vehicle occupancy analysis
- 5. Public Transportation
 - a. Location and availability of public transportation facilities
 - b. Usage and capacity of existing system
 - c. Peak-hour demand and capacity analysis
 - d. Measures to encourage use of public transportation
- 6. Pedestrian Circulation
 - a. Demand and capacity analysis on project area sidewalks
 - b. Connections to public transportation station stops
 - c. Effect on pedestrian flows of project parking and servicing entrances and exits
- 7. Access Plan
 - a. Measures to manage parking demand and optimize use of available parking spaces, including:
 - o Proposed rate structure(s)
 - o Ride-sharing incentives and information dissemination
 - o Set-asides for high-occupancy-vehicles: number and location
 - o Set-asides for after morning commuter peak (usually 9:30 or 10:00 a.m.)
 - b. Measures to encourage public transportation use, including:
 - o Mass transit information dissemination
 - o MBTA pass sales and subsidies
 - c. Measures to reduce peaking, including:
 - o Encouragement of flexible work hours
 - o Restrictions on service and good deliveries
 - d. Measures to mitigate construction impacts, including:
 - o Time and routes of truck movements
 - o Storage of materials and equipment
 - o Worker parking and commuting plan

In addition to the above material, the Boston Transportation Department has provided comments entitled "Additions to Scope of Access Plan for Commonwealth Center," which should be considered for each development option. Those comments are found in Appendix 2.

III. ENVIRONMENTAL PROTECTION COMPONENT

1. Shadow

A shadow analysis shall be required for existing and build conditions for the hours 9:00 a.m., noon, and 3:00 P.M. for the vernal equinox, summer solstice, autumnal equinox, and winter solstice. It should be noted that due to time differences (daylight savings vs. standard), the autumnal equinox shadows would not be the same as the vernal equinox shadows and therefore separate shadow studies are required for the vernal and autumnal equinoxes.

The shadow impact analysis must include net new shadow, as well as existing shadow and must clearly show the incremental impact of the proposed buildings.

Design or other mitigation measures to limit or minimize any adverse shadow impact shall be identified.

2. Air Quality

A description of the garage exhaust system, including location and specifications, and an analysis of the impact on pedestrian level air quality from operation of the exhaust system shall be required. Measures to avoid any violation of air quality standards shall be described.

3. Construction Impacts

A construction impact analysis shall include a description and evaluation of the following:

- a. potential dust and pollutant emissions and mitigation measures to control these emissions.
- b. potential noise impact and mitigation measures to minimize increase in noise levels.
- c. location of construction staging areas and construction worker parking.
- d. construction schedule, including hours of construction activity.
- e. access routes for construction trucks and anticipated volume of construction truck traffic.
- f. measures to protect the public safety.

g. foundation construction methodology, amount and method of excavation, pile driving proposals, and measures to prevent any adverse effects on adjacent buildings and utility lines and on groundwater levels.

h. asbestos removal program.

IV. URBAN DESIGN COMPONENT

Pursuant to Section 31-5, Paragraph 2, and Section 31-8 of Article 31 of the Boston Zoning Code, the following urban design objectives shall be addressed in the analysis of options required in the Draft Project Impact Report.

The following objectives should guide the development of the required options.

1. Streetwall: The Cambridge Streetwall should reinforce a building line that provides definition to the east side of the street.
2. Character: The height, massing, materials, and details of the project should be compatible with and reinforce the character of the west side of the street.
3. Activity: The project should provide active retail uses compatible with the existing uses on Cambridge Street.
4. Fabric: Streets and buildings in the project should reflect the street and block pattern of the west side of Cambridge Street.
6. Vistas: The project should provide attractive vistas from the Beacon Hill streets opposite the site.
7. Open Space: Existing surface parking areas and open spaces should be landscaped to improve their appearance.

In order to determine that the proposed project is (a) architecturally compatible with surrounding structures; (b) exhibits an architectural concept that enhances the urban design features of the district in which it is located; (c) augments the quality of the pedestrian environment; and (d) is consistent with design guidelines for the area, the following items must be submitted for all development options:

1. Written description of program elements and space allocation for each element
2. Neighborhood plan and sections at an appropriate scale (1" = 50' or larger) showing relationships of the proposed project to the neighborhood's:
 - a. massing

- b. building height
 - c. scaling elements
 - d. open space
 - e. major topographic features
 - f. pedestrian and vehicular circulation
 - g. land use
- 3. Black and white 8"x10" photographs of the site and neighborhood
 - 4. Sketches and diagrams to clarify design issues and massing options
 - 5. Eye-level perspective (reproducible line drawings) showing the proposal in the context of the surrounding area
 - 6. Aerial views of the project
 - 7. Site sections at 1" = 20' or larger showing relationships to adjacent buildings and spaces
 - 8. Site plan at an appropriate scale (1" = 20' or larger) showing:
 - a. General relationships of proposed and existing adjacent buildings and open space
 - b. Open spaces defined by buildings on adjacent parcels and across streets
 - c. General location of pedestrian ways, driveways, parking, service areas, streets, and major landscape features
 - d. Pedestrian, handicapped, vehicular and service access and flow through the parcel and to adjacent areas
 - e. Survey information, such as existing elevations, benchmarks, and utilities
 - f. Phasing possibilities
 - g. Construction limits

9. Massing model at 1" = 100' for use in the Authority's downtown base model and a study model at 1" = 16' showing facade design.
10. Drawings at an appropriate scale (e.g., 1" = 8') describing architectural massing, facade design and proposed materials including:
 - a. Building and site improvement plans
 - b. Elevations in the context of the surrounding area
 - c. Sections showing organization of functions and spaces
11. Preliminary building plans showing ground floor and typical upper floor(s)
12. Proposed schedule for submission of design development materials

Submission requirements for Design Development and Contract Documents submissions can be found in Appendix 3.

V. HISTORIC RESOURCES COMPONENT

See also Appendix 4, Letter of Comment from the Boston Landmarks Commission.

1. Description of the project site in proximity to a National or Massachusetts Register site or district or Landmark designated by the Boston Landmarks Commission
2. Possible effects to the National or Massachusetts Register site or district or a Landmark designated by the Boston Landmarks Commission

VI. INFRASTRUCTURE SYSTEMS COMPONENT

Energy requirements include electricity, gas, consumption and other utilities but do not refer to thermal transfer values or insulation efficiency (except as that could be referenced as a mitigating factor for energy consumption, similar to the recycling of water).

Article 31, Section 31-10 states:

"...The Applicant's submission shall include an evaluation of the Proposed Project's impact on the capacity and adequacy of existing water, sewerage, energy (including gas), and electrical (including telephone, cable, computer, etc.) utility systems, and the need reasonably attributable to the Proposed Project for additional systems facilities."

Any system upgrading or connection requiring a significant public or utility investment or creating a significant disruption in vehicular or pedestrian circulation, or affecting any public or neighborhood park or streetscape improvements, comprises an impact which must be mitigated. The project proponents must research and demonstrate anticipated impacts in this regard, including specific mitigation measures, if necessary. Infrastructure impacts analysis should include any other known projects which affect the same service systems.

PNF items B10 and B13 (in the Environmental Impact description) should be considered in light of each other (waste storage/handling and rodent control). In order to access the proposed projects likely infrastructure impacts, the following items must be submitted for all development options:

1. Utility Systems

- a. Estimated water consumption and sewage generation from the project
- b. Description of the capacity and adequacy of water and sewer systems and an evaluation of the impacts of the project on these systems
- c. Identification of measures to conserve resources, including any provisions for recycling

2. Water Quality

- a. Description of impacts of the project on the water quality of Boston Harbor or other water bodies that could be affected by the project, if applicable

- b. Description of mitigation measures to reduce or eliminate impacts on water quality
- 3. Energy
 - a. Description of energy requirements of the project and evaluation of project impacts on resources and supply.

Thorough consultation with the planners and engineers of the utilities will be required, and should be referenced in the Infrastructure Component report. A presentation of the proposed project, with special focus on infrastructure (and transportation and public improvements) issues, before the Traffic Liaison Committee is strongly recommended.

APPENDICES

Appendix 1

REQUIRED FINANCIAL INFORMATION

REQUIRED FINANCIAL INFORMATION -- CHARLES RIVER PLAZA

DEVELOPMENT PROFORMA includes all the information normally found in a development proforma, by phase. This includes, but is not limited to:

Land costs, per land square foot and total, by parcel.

Attribution of acquisition expense over project components. (per FAR square foot residential, office, parking, etc.)

All hard costs on a per-unit and total basis, by phase. (disaggregated into base building, tenant improvement work, rehabilitation work, garage cost, site work, furniture, fixtures and equipment, etc.)

All soft costs on a per-unit and total basis, by phase. (disaggregated into individual line items such as architectural, engineering, legal, accounting and developer's fees and any other professional fees, insurance, permits, real estate tax during construction, etc.)

All contingencies, by phase (specify whether contingency is on hard cost, soft cost, or total cost).

All assumptions regarding financing terms on predevelopment, and construction loans, by phase (including financing fees, interest rates, terms, drawdown assumptions, terms, participations, amortization).

Calculation of housing and jobs linkage obligation, and anticipated payment method (over term of obligation or on a net present value basis).

Any other project-related expenses not within any of the above categories.

Calculation of total development cost by component, including total and per unit breakdown (e.g. per square foot office, retail, etc., per parking space, etc.)

Sources of debt and equity for total project costs.

Appropriate return measures (return on equity, return on total development cost, internal rate of return; specify method of calculation and hurdle rates).

10-YEAR OPERATING PROFORMA includes all the information normally found in an operating proforma, on a yearly basis. This includes, but is not limited to:

Tabulation of gross and net (leasable) square feet for all commercial space.

Schedule of all rents on a per square foot and total basis (including anticipated garage rates and occupancy).

Anticipated operating expenses and real estate taxes on per square foot and total basis, and clear explanation of division of expenses between owner and tenant (includes all commercial space, hotel, and garage)

All other expense and vacancy assumptions set forth to calculate cash available for debt service.

Anticipated leasing patterns (5-yr, 10-yr, etc.), lease-up rates and calculation of operating deficits if any.

Tenant inducements including free rent, tenant improvement allowances, etc.

Calculation of debt service, before tax cash flow, debt coverage ratios.

BOSTON TRANSPORTATION DEPARTMENT

ADDITIONAL SCOPE

KC19/B/22



BOSTON
TRANSPORTATION
DEPARTMENT

ONE CITY HALL PLAZA/ROOM 721
BOSTON, MASSACHUSETTS 02201
(617) 725-4680

Submitted
6/8/88

ADDENDUM
to
ARTICLE 31 ACCESS PLAN SCOPE
for
CHARLES RIVER PLAZA

1. Parking and Loading. Since the project as outlined involves a diminution in the number of parking spaces even as the number of square feet increases, the parking section should start with an evaluation of the function of the existing garage and surface lot. Excess capacity should be identified according to time of day and day of week; turnover rates should be derived for the different user types; and some measure should be attempted of price elasticity of demand.

For the build scenario, forecasts should be made of the level of utilization of spaces by different user types and the degree to which joint use of spaces (e.g. by office workers and cinema patrons) can result in lower total parking space demand. This estimate will require analysis of turnover, peak accumulation, and price sensitivity in addition to trip generation and vehicle occupancy factors. Total parking demand should be set in the context of areawide parking availability and pricing. The goal of the project should be to provide enough parking on-site that no additional demand will be placed on parking supply on-street or at other facilities.

This project may make it feasible and desirable to close the Cambridge St. garage entrance and open the currently unused entrance on Blossom St. This option should be examined in conjunction with various designs of the loading docks, as detailed below.

The potential for providing parking for the surrounding residential neighborhood should be examined. Various options with regard to rates and terms should be explored, including night-time and 24-hour use.

Insofar as the project contemplates an adjustment in the number of parking spaces, the effect on the public supply, as regulated by the Boston Parking Freeze and the Air Pollution Control Commission, should be documented.

The loading situation needs to be evaluated with regard to a variety of factors: the demand generated by the different uses (office, retail, grocery store, etc.); the need for sufficient internal maneuvering space for trucks of all sizes, to ensure that on-street flow will not be disrupted by trucks backing in or out; the

RAYMOND L. FLYNN, MAYOR
RICHARD A. DIAMINO, COMMISSIONER



possibility, mentioned above, that the Cambridge St. garage entrance can be closed and the Blossom St. entrance opened; and the possibility that the street behind the project may be opened to project traffic.

Accordingly, the following scenarios should be analyzed.

- 1) As currently proposed in preliminary plans submitted to the BRA, with the Blossom St. garage entrance closed and the loading docks in its place.
- 2) With the Blossom St. garage entrance open and the rear wall of the building opened up so as to allow both entrance to the parking garage and adequate maneuvering space for as many full-sized trucks as necessary to serve the project. Structural analysis of the feasibility of this option will be accepted.
- 3) With the rear road opened so as to allow trucks access to the docks from both O'Connell Way and Blossom St.
- 4) With the physical layout as proposed, but with a strictly enforced control of truck delivery hours and schedules, which guarantees no disruption of traffic along Blossom St.

2. Vehicular Traffic. The following intersections should be analyzed as regards existing conditions, and the impact of the proposed project forecast:

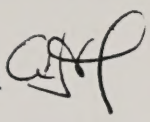
Cambridge/Somerset/Sudbury
Cambridge/Bowdoin/New Chardon
Cambridge/Temple/Stamford
Cambridge/Blossom/Garden
Cambridge/Joy
Cambridge/Grove
Cambridge/South Russell
Blossom/Storrow Dr.

Project impact on Cambridge Street, a highly congested major corridor, should be carefully analyzed. Every attempt must be made to model the real-world situation, including such phenomena as back-up from one intersection blocking the previous one, delays caused by cars weaving (as from Bowdoin St. to Stamford St.), pedestrian conflicts, etc. Standard level-of-service calculations should be adjusted according to observations of practical conditions. For the minor intersections along Cambridge St. (Joy and South Russell), qualitative analysis will be accepted.

Measures to diminish vehicular travel demand will be of particular importance given the proposed decrease in parking. An enhanced delivery service from the Stop & Shop, as well as a shuttle service to and from the North End, West End, and/or Beacon Hill would be especially effective.

3. Pedestrian Circulation. Analysis of pedestrian activity and circulation deficiencies should be undertaken within the project site, as well as along both sides of Cambridge Street in front of the site. Sidewalk capacity analyses should include estimates of future no-build and build pedestrian volumes. Analysis should follow procedures given in the 1985 Highway Capacity Manual. In addition, pedestrian corridors, including indoor and outdoor connections open to public crossing, should be identified. Connections to Charles River Park should be graphically displayed; barriers and qualitative deficiencies should be identified, as well as measures to improve such conditions.

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Appendix 3

SUBMISSION REQUIREMENTS FOR DESIGN DEVELOPMENT AND CONTRACT DOCUMENTS SUBMISSIONS

SUBMISSION REQUIREMENTS FOR DESIGN DEVELOPMENT
AND CONTRACT DOCUMENTS SUBMISSIONS

Phase II Submission: Design Development

1. Revised written description of project
2. Revised site sections
3. Revised site plan showing:
 - a. Relationship of the proposed building and open space to existing adjacent buildings, open spaces, streets, and buildings and open spaces across streets
 - b. Proposed site improvements and amenities including paving, landscaping, lighting and street furniture
 - c. Building and site dimensions, including setbacks and other dimensions subject to zoning requirements
 - d. Any site improvements or areas proposed to be developed by some other party (including identification of responsible party)
 - e. Proposed site grading, including typical existing and proposed grades at parcel lines
4. Dimensioned drawings at an appropriate scale (e.g., 1" = 8') developed from approved schematic design drawings which reflect the impact of proposed structural and mechanical systems on the appearance of exterior facades, interior public spaces, and roofscape including:
 - a. Building plans
 - b. Preliminary structural drawings
 - c. Preliminary mechanical drawings
 - d. Sections
 - e. Elevations showing the project in the context of the surrounding area as required by the Authority to illustrate relationships or character, scale and materials
5. Large-scale (e.g., 3/4" = 1'-0") typical exterior wall sections, elevations and details sufficient to describe specific architectural components and methods of their assembly

6. Outline specifications of all materials for site improvements, exterior facades, roofscape, and interior public spaces
7. Eye-level perspective drawings showing the project in the context of the surrounding area
8. Samples of all proposed exterior materials
9. Complete photo documentation (35 mm color slides) of above components including major changes from initial submission to project approval

Phase III Submission: Contract Documents

1. Final written description of project
2. A site plan showing all site development and landscape details for lighting, paving, planting, street furniture, utilities, grading, drainage, access, service, and parking
3. Complete architectural and engineering drawings and specifications
4. Full-size assemblies (at the project site) of exterior materials and details of construction
5. Eye-level perspective drawings or presentation model that accurately represents the project, and a rendered site plan showing all adjacent existing and proposed structures, streets and site improvements
6. Site and building plan at 1" = 100' for Authority's use in updating its 1" = 100' photogrammetric map sheets

Phase IV Submission: Construction Inspection

1. All contract addenda, proposed change orders, and other modifications and revisions of approved contract documents which affect site improvements, exterior facades, roofscape, and interior public spaces shall be submitted to the Authority prior to taking effect.
2. Shop drawings of architectural components which differ from or were not fully described in contract documents

Appendix 4

BOSTON LANDMARKS COMMISSION
LETTER OF COMMENT



Boston Landmarks Commission

City of Boston
The Environment
Department

Boston City Hall/Room 805
Boston, Massachusetts 02201
617/725-3850

May 27, 1988

Mr. Muhammad Abdus Sabur
Boston Redevelopment Authority
Boston City Hall
Boston, MA 02201

Dear Muhammad:

The staff of the Boston Landmarks Commission has reviewed the Project Notification Form for Charles River Plaza submitted by Charles River Park B Company and Charles River Plaza Company. The review is accurate in its factual presentation of the historic resources.

The project does not appear to affect directly any historic resources on site; it will have an impact on adjacent resources. To that end, the staff reiterates that the direction of the new design be contemporary and not be replicas of historic buildings.

Thank you for the opportunity to comment.

Sincerely,

Judith H. Mahoney
Judith H. Mahoney
Executive Director
Boston Landmarks Commission

ms:1482E

